

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

03-MD-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

NOTICE OF AMENDMENT  
AS TO THE TALIBAN AND  
MUHAMMED OMAR

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This document relates to: *Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)  
(and member case *Burlingame v. Bin Laden, et al.*, 02-cv-7230 (GBD)(SN)).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, in a form similar to notices previously permitted and approved by this Court in its December 1, 2020 Order Approving Notices to Conform, Short Form Complaints & Notices of Amendment as to Sudan, ECF NO. 6547, and October 28, 2019 Amended Order Approving Notices to Conform, Short Form Complaints and Notices of Amendment addressing claims against the Kingdom of Saudi Arabia and the Islamic Republic of Iran, ECF No. 5234. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Taliban and Muhammad Omar. The underlying Complaint is deemed amended to include the factual allegations, jurisdictional allegations, and jury trial demand of the *Ashton* Plaintiffs First Amended Complaint, No. 02-CV-6977, ECF No. 2 (hereinafter, the “*Ashton* First Amended Complaint”), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Taliban and Muhammad Omar and does not apply

to any other defendant.

Upon filing this Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint, including the default judgment entered by this Court on May 12, 2006, ECF 1797, which identifies the Taliban and Muhammad Omar as defendants in Exhibit B filed at ECF 1782-5, April 27, 2006.

### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference the following factual allegations, jurisdictional allegations, and jury trial demand in the following complaint:

- *Ashton* First Amended Complaint, No. 02-CV-6977, ECF No. 2.

### **IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the nature of the New Plaintiff's claim.

	<b>Plaintiff's Name (alphabetical by last name)</b>	<b>Plaintiff's State of Residency at filing (or death)</b>	<b>Plaintiff's Citizenship / Nationality on 9/11/2001</b>	<b>9/11 Decedent's Full Name</b>	<b>Plaintiff's Relationship to 9/11 Decedent</b>	<b>9/11 Decedent's Citizenship/ Nationality on 9/11/2001</b>	<b>Nature of Claim (wrongful death, solatium, personal injury)</b>
1	Nolan, Susan, Individually and as Personal Representative of the Estate of Thomas Cullen, Deceased	New Jersey	USA	Thomas Cullen	PR/Spouse	USA	WD, Solatium
2	Nolan, Thomas P. Cullen	New Jersey	USA	Thomas Cullen	Child	USA	Solatium
3	Cooper, Melinda, Individually and as Personal Representative of the Estate Julian Cooper	Delaware	USA	Julian Cooper	PR/Spouse	USA	WD, Solatium
4	Cooper, Julianah	Delaware	USA	Julian Cooper	Child	USA	Solatium
5	Cooper Canady, Darlene	Virginia	USA	Julian Cooper	Sibling	USA	Solatium
6	Dory, Marie Annette	Maryland	USA	Julian Cooper	Sibling	USA	Solatium
7	Dory, Marie Annette, as Personal Representative of the Estate of Rosa Marie Cooper	Maryland	USA	Julian Cooper	Parent	USA	Solatium
8	Dory, Marie Annette, as Personal Representative of the Estate of	Maryland	USA	Julian Cooper	Sibling	USA	Solatium

	Delman Phillip Cooper						
9	Furman, Andrew, Individually and as Co-Personal Representative of the Estate of Steven Furman, Deceased	Texas	USA	Steven Furman	Co-PR/Sibling	USA	WD, Solatium
10	Furman, Chava, Individually and as Co-Personal Representative of the Estate of Steven Furman, Deceased	Maryland	USA	Steven Furman	Co-PR/Spouse	USA	WD, Solatium
11	Furman, Nisan	Maryland	USA	Steven Furman	Child	USA	Solatium
12	Furman, Menashe	Maryland	USA	Steven Furman	Child	USA	Solatium
13	Furman, Sara Rachel	Maryland	USA	Steven Furman	Child	USA	Solatium
14	Furman, Jayne	Nevada	USA	Steven Furman	Sibling	USA	Solatium
15	Furman, Michael	Nevada	USA	Steven Furman	Sibling	USA	Solatium
16	Furman, Jayne, as Co-Personal Representative of the Estate of Joyce Lilie	Nevada	USA	Steven Furman	Parent	USA	Solatium
17	Furman, Michael, as Co-Personal Representative of the Estate of Joyce Lilie	Nevada	USA	Steven Furman	Parent	USA	Solatium

18	Lilie, Janis, as Personal Representative of the Estate of Harold Lilie	Nevada	USA	Steven Furman	Stepparent	USA	Solatium
19	Furman, Marvin	Florida	USA	Steven Furman	Parent	USA	Solatium

Dated: April 19, 2022  
Rye Brook, New York

Respectfully submitted,

By: s/ Frank H. Granito  
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